BEFORE THE TENNESSEE REGULATORY AUTHORITY

IN RE:),	02	JRN	30	Quality (. 32
APPLICATION OF SCC COMMUN)					
CORP FOR A CERTIFICATE OF 1	PUBLIC	.)	\mathbb{E}^{N}	6Ck	ET	NO: 01	00050
CONVENIENCE AND NECESSITY	Y TO)					
PROVIDE COMPETING LOCAL)					
TELECOMMUNICATIONS SERV	ICES)) .
WITHIN THE STATE OF TENNES	SSEE	•)					

MOTION FOR CONTINUANCE

Comes now Intrado Communications Inc. ("ICI") to request that the hearing currently scheduled in the above-captioned matter for January 29, 2002 be continued for at least thirty (30) days. In support of this request, ICI states as follows:

- 1. On December 28, 2001, the Tennessee Regulatory Authority ("Authority") issued a "Notice of Hearing" that set a hearing in the above-captioned proceeding for January 29, 2002.
- 2. The "Notice of Hearing" apparently was served by facsimile on or about December 28, 2001. However, it appears that the "Notice of Hearing" was served on an ICI representative that is no longer in ICI's employ.
- 3. ICI learned of the "Notice of Hearing" on January 28, 2002 when the undersigned received a telephone call from Ms. Patsy Fulton of the Authority. The undersigned was not aware of the "Notice of Hearing" until receiving Ms. Fulton's telephone call.
- 4. ICI was unaware of the "Notice of Hearing," and as a result, ICI is unable to attend the hearing scheduled for January 29, 2002.
- 5. ICI respectfully requests the hearing scheduled for January 29, 2002 be continued for at least thirty (30) days so that ICI can make arrangements to appear before the Authority in the above-captioned matter.

6. This motion is not made solely for purposes of delay. Granting this motion will not prejudice any party to this proceeding.

Respectfully submitted this ______ day of January 2002.

Intrado Communications Inc.

By:

David A. Huberman Corporate Counsel

Intrado Inc.

6285 Lookout Road

Boulder, CO 80301-3343

Facsimile:

(303) 581-0090

Telephone:

(303) 581-5600

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion for Continuance has been served on the foregoing via first class U.S. mail, facsimile, hand delivery, or overnight delivery on this the 28th day of January 2002:

Ardmore Telephone Company, Inc. P. O. Box 549 517 Ardmore Avenue Ardmore, TN 38449

BellSouth 333 Commerce Street Nashville, TN 37201-3300

Century Telephone of Adamsville P. O. Box 405 116 N. Oak Street Adamsville, TN 38310

Century Telephone of Claiborne P. O. Box 100 507 Main Street New Tazewell, TN 37825

Century Telephone of Ooltewah-Collegedale, Inc. P. O. Box 782 5616 Main Street Ooltewah, TN 37363

Citizens Communications Company of Tennessee P. O. Box 770 300 Bland Street Bluefield, WV 24701

Citizens Communications Company of the Volunteer State P. O. Box 770 300 Bland Street Bluefield, WV 24701

Loretto Telephone Company, Inc. P. O. Box 130 Loretto, TN 38469 Millington Telephone Company, Inc. 4880 Navy Road Millington, TN 38053

Sprint-United 112 Sixth Street Bristol, TN 37620

TDS Telecom-Concord Telephone Exchange, Inc. P. O. Box 22610 701 Concord Road Knoxville, TN 37933-0610

TDS Telecom-Humphreys County Telephone Company P. O. Box 552 203 Long Street New Johnsonville, TN 37134-0552

TDS Telecom-Tellico Telephone Company, Inc. P. O. Box 9
102 Spence Street
Tellico Plains, TN 37385-0009

TDS Telecom-Tennessee Telephone Company P. O. Box 18139 Knoxville, TN 37928-2139

TEC-Crockett Telephone Company, Inc. P. O. Box 7 Friendship, TN 38034

TEC-People's Telephone Company, Inc. P. O. Box 310 Erin, TN 37061

TEC-West Tennessee Telephone Company, Inc. P. O. Box 10 244 E. Main Street Bradford, TN 38316 United Telephone Company P. O. Box 38 120 Taylor Street Chapel Hill, TN 37034

David A. Huberman